

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X  
UNITED STATES OF AMERICA,

Plaintiff,

- against -

LOCAL 282 OF THE INTERNATIONAL  
BROTHERHOOD OF TEAMSTERS, ET. AL.,

Defendants.  
----- X

X

:

:

:

:

:

:

:

:

:

:

X

CV 94-2919 (TCP)

**NOTICE OF MOTION FOR  
CONTEMPT**

**PLEASE TAKE NOTICE** that upon the Affidavit of Robert A. Machado, sworn to March 13, 2012, together with the exhibits annexed thereto, and the accompanying Memorandum of Law, the Honorable Milton Mollen, shall move, before the Honorable Thomas C. Platt , U.S.D.J., United States Courthouse, 1044 Federal Plaza, Central Islip, New York, 11722, for an Order: (1) enforcing the subpoena dated October 7, 2011 and served on E.M.E. Inc. ("E.M.E.") on October 11, 2011, and compelling E.M.E.'s compliance therewith; (2) holding E.M.E. in contempt and imposing sanctions pursuant to Rule 45(e); (3) requiring that E.M.E. reimburse Local 282 for reasonable expenses incurred by reason of E.M.E.'s contempt of court, including all of the expenses of this motion; and (4) for such further relief as this Court may deem just and proper.

Dated: New York, New York  
March 13, 2012

HERRICK, FEINSTEIN LLP

By: \_\_\_\_\_

*Milton Mollen*  
Milton Mollen

2 Park Avenue  
New York, New York 10016  
Telephone: (212) 592-1400  
Facsimile: (212) 592-1500  
*Investigations Counsel*